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AO 91 (Rev. 11/11) Criminal Complaint

Special Agent:

Jeffrey Jacobs, FBI

Telephone: (248) 879-6090

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America
V.
Sheldon Robertson

Case No.

Case: 2:23-mj-30107 Assigned To: Unassigned Assign. Date: 3/11/2023 SEALED MATTER (LH)

## **CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.							
On or about the date(s) of		S	eptember 2022	in the county of	Wayne	in the	
Eastern	District of	Michigan	, the defen	ndant(s) violated:			
Code Section			Offense Description				
21 U.S.C. § 841(a)(1), (b)(1)(C)		Distribution of a Controlled Substance Resulting in Serious Bodily Injury					
This crin	minal complaint is b	pased on these	e facts:				
See attached affida	avit.						
✓ Continued o	n the attached shee	t.		Och Jou	b		
			_	- Complainant's	signature		
			_	Jeffrey Jacobs, Specia			
Sworn to before me	and signed in my prese	nce		Printed name	and title		
and/or by reliable electronic means.				6- P. )			
Date: March 11, 2	2023		_	Judge's sign	nature		
City and state: <u>Det</u>	roit, MI			Hon. Anthony P. Patti, United Printed name		e Judge	

## AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jeffrey Jacobs, being duly sworn, depose and state as follows:

- 1. I am a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such. I have been employed as a Special Agent since January 2005 and am currently assigned to the FBI Oakland County Gang and Violent Crime Task Force (OCGVCTF). I have conducted and participated in numerous criminal investigations including bank robberies, violent crimes, extortionate extensions of credit, carjacking, gang related shootings, interstate theft, and narcotics trafficking.
- 2. The statements contained in this Affidavit are based in part on information provided by other Special Agents and/or local law enforcement officers, witnesses, my observations, and my experience. The facts in paragraph three and four of this affidavit were provided by Adult Victim 1 ("AV1") to members of the OCGVCTF in January 2023. I have not included all the facts known about the case, but only those necessary to establish probable cause.
- 3. In September 2022, AV1 purchased a heroin/fentanyl mixture masked as heroin from Sheldon Robertson at a residence on Dequindre Street in Detroit, Michigan.
- 4. A short time after completing the purchase, AV1 used some of the heroin/fentanyl mixture he/she purchased from Robertson. AV1 overdosed on the heroin/fentanyl mixture and fell unconscious while driving. AV1's vehicle ran over a

curb before coming to a stop.

- 5. Saint Clair Shores police officers and firefighters/EMTs responded to the scene of AV1's vehicle. AV1 was unconscious and exhibiting agonal breathing when officers found him/her. Firefighter/EMTs administered 2 mg of Narcan—a medicine used to rapidly reverse an opioid overdose—to AV1. The first dose of Narcan had no effect. Firefighter/EMTs administered a second 2 mg dose of Narcan to AV1. AV1 regained consciousness after the second dose of Narcan. AV1 was transported to a nearby hospital for further treatment.
- 6. While conducting an inventory search of the AV1's vehicle, Saint Clair Shores officers found a clear cellophane wrap containing 20 lottery folds of suspected narcotics. Officers conducted a field test of the suspected narcotics, which yielded positive indication for fentanyl.
- 7. Members of OCGVCTF met with AV1 in early 2023 and reviewed text message conversations in his/her cell phone between AV1 and phone number XXX-XXX-0557 that occurred after AV1's September 2022 overdose. In those messages, there were multiple instances where AV1 reached out to the XXX-XXX-0557 number. Per AV1, the purpose of the text messages was to set up a drug transaction to purchase heroin/fentanyl. In at least one of messages, AV1 explicitly referenced a "30 pack," which I know to be code for packs of heroin/fentanyl. In those exchanges, the XXX-XXX-0557 number responded to AV1 acknowledging their request, and on at least one occasion instructed AV1 to meet at "Dequindre."

- 8. On March 08, 2023, pursuant to an administrative subpoena, AT&T advised the call number XXX-XXX-0557 is registered to Sheldon Robertson, at XXXX2 Dequindre Street, Detroit, Michigan, 48234.
- 9. Based on the above information, there is probable cause to believe that Sheldon Deandre Robertson, has violated 21 U.S.C. § 841(a)(1), (b)(1)(C) Distribution of a Controlled Substance Resulting in Serious Bodily Injury.

Respectfully submitted

Special Agent Jeffrey Jacobs

FBI Oakland County Gang/Violent Task Force

Sworn to before me and signed in my presence and/or by reliable electronic means

Honorable Anthony P. Patti United States Magistrate Judge

Dated: March 11, 2023